

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
Priscilla Stuart	:	Case No.: 17-14905(AMC)
	:	
Debtor	:	Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Priscilla Stuart, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about August 4, 2016.
2. The Chapter 13 filing was assigned case number 16-15547-MDC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about June 8, 2017
4. On or about April 24, 2020, Debtor was involved in an automobile accident in which her vehicle was totaled.
5. As a result of the automobile accident, Debtor wishes to surrender the 2009 Hyundai Sonata, which is currently being paid outside the confirmed plan, to the creditor.
6. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "**Exhibit A**", and is currently affordable by the Debtor.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: May 21, 2020

/s/Brad J. Sadek, Esq
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